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Court Appointed Class Counsel

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

REBEKAH BAHARESTAN and JENA
MCINTYRE, on behalf of themselves and all
others similarly situated,

Plaintiffs,

v.

VENUS LABORATORIES, INC., dba EARTH
FRIENDLY PRODUCTS, INC.,

Defendant.

Case No. 3:15-cv-03578-EDL

**DECLARATION OF JENA
MCINTYRE IN SUPPORT OF
PLAINTIFFS' MOTION FOR
AWARD OF ATTORNEYS' FEES,
AND REIMBURSEMENT FOR
COSTS AND SERVICE AWARDS**

Date: March 15, 2016

Time: 9:00 a.m.

Location: Courtroom E

Judge: Hon. Elizabeth D. Laporte

[Filed concurrently with Declarations of
Melissa W. Wolchansky, Mark N. Todzo,
Jena McIntyre, and Jeffrey D. Dahl; and
Notice of Motion and Motion for Award
of Attorneys' Fees, and Reimbursement
for Costs and Service Awards]

1 I, Jena McIntyre, declare under penalty of perjury, that the following is true and correct to
2 the best of my knowledge and belief:

3 1. The statements made in this Declaration are based on my personal knowledge
4 and, if called as a witness, I could and would testify thereto.

5 2. I am a named Plaintiff in this class action. This Declaration is given in support of
6 my request that the Court award attorney fees to class counsel, reasonable costs, and service
7 awards in this class settlement.

8 3. I am a citizen of Washington and reside in Skagit County, Washington.

9 4. I brought this action against Venus Laboratories, Inc., d/b/a Earth Friendly
10 Products, Inc. ("EFP") because EFP deceptively represented its Dishmate and Laundry Detergent
11 Products to be natural, naturally derived, made from plants, and safer alternatives to traditional
12 detergents, when in fact those products contain highly processed and/or non-natural ingredients,
13 including methylisothiazolinone ("MIT").

14 5. Having seen EFP's representations and unwittingly purchased EFP's products
15 containing highly processed and/or non-natural ingredients, I retained Halunen Law and sought
16 their assistance in ending EFP's practice of marketing products containing highly processed
17 and/or non-natural ingredients as natural, naturally derived, made from plants, and safer
18 alternatives.

19 6. Both prior to and subsequent to signing a retainer agreement with Halunen Law,
20 we discussed my responsibilities as a Plaintiff and a possible Class Representative.

21 7. I have spent significant time on this case. My attorneys kept me informed of the
22 filings in the case and their settlement offers to EFP. I was provided with copies of the
23 Complaint, proposed settlement terms, and ultimate settlement agreement. I have consulted with
24 my counsel, by telephone, to discuss my experience with EFP products. I have reviewed,
25 discussed, and helped determine the actions to be taken and decisions to be made in pursuit of
26 this case on behalf of all class members.

27 8. Throughout these proceedings, I have been willing to be deposed and/or to testify
28

1 in court proceedings if called upon to do so.

2 9. Based on my interactions and relationship with my counsel, I believe my counsel
3 has fairly and adequately represented the class and will continue to do so.

4 10. I understand that, as a class representative, I have an obligation to assert and
5 protect the interests of other class members and not act just for my own personal benefit. I do not
6 have any conflict with other class members. I have done my best to protect the interests of other
7 class members and fairly and adequately to represent the class to the best of my ability.

8 11. My counsel have procured a settlement of this action on a class-wide basis, which
9 I have approved.

10 12. I request that the Court approve the award of attorneys' fees to my counsel and
11 the service award to me as class representative.

12 I declare under the penalty of perjury under the laws of the United States of America that
13 the foregoing is true and correct.

14 Executed on this 14th day of January, 2016 in Sedro Wolley, Washington.

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17 By: 
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JENA MCINTYRE